

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

VICTOR WILSON  
6930 Kleindale Avenue  
Cincinnati, Ohio 45231

Plaintiff,

vs.

P.O. TRENT MEUCCI,  
Individually and in his official capacity  
as an Officer for the City of Cincinnati  
Police Department  
c/o Cincinnati Police Department Dist. 3  
2300 Ferguson Road  
Cincinnati, Ohio 45238

and

P.O. CAMERON MULLIS  
Individually and in his official capacity  
As an Officer for the City of Cincinnati  
Police Department  
c/o Cincinnati Police Department Dist. 3  
2300 Ferguson Road  
Cincinnati, Ohio 45238

and

CITY OF CINCINNATI  
c/o Law Department  
801 Plum Street  
Cincinnati, Ohio 45202

Defendants.

: CASE NO.:  
:  
: JUDGE:  
:  
: MAGISTRATE:  
:

**COMPLAINT WITH  
JURY DEMAND**

The plaintiff Victor Wilson, through Counsel and for his Complaint, states the following:

**NATURE OF ACTION**

1. The Plaintiff Victor Wilson brings this action against the Defendants for violation of his civil rights under color of state law. Mr. Wilson brings his claims under 42 U.S.C. § 1983 and U.S.C § 1988 for violation of his rights under the First, Second, Fourth, and Fourteenth Amendments to the Constitution of the United States.
2. Mr. Wilson seeks compensatory damages from all Defendants in excess of \$100,000.00, and punitive damages in the amount of \$500,000.00 from the individual Defendant Police Officers, in their individual and official capacity, together with costs and attorney's fees, in amounts to be determined at trial.

### **JURISDICTION AND VENUE**

3. This Court has jurisdiction over Mr. Wilson's claims pursuant to 28 U.S.C. §1331 (federal question) and 28 U.S.C. §1343 (civil rights.)
4. All of the events giving rise to this lawsuit occurred, and on information and belief, all Defendants work and reside within the Southern District of Ohio, Western Division. Venue is therefore proper under 28 U.S.C. §1391.

### **UNDERLYING FACTS OF THE CASE**

5. On or about June 18, 2023 in the City of Cincinnati, Mr. Wilson and his family were involved in a verbal disagreement with a group of individuals who were surrounding the home of Mr. Wilson's family members.
6. Mr. Wilson called Cincinnati Police and requested assistance because the group of individual were threatening to attack him and his family members.
7. Mr. Wilson immediately advised the police officers who responded to the scene that his was a concealed carry permit holder, and he did have his weapon on his person.

8. The responding officers told the aggressive group to leave, and the group moved down the street, but still were close. Mr. Wilson requested that the officers not leave him until the group fully dispersed. The officers left.
9. The aggressive group returned and were attempting to attack Mr. Wilson and his family.
10. Mr. Wilson discharged his firearm into the air to disperse the aggressive group.
11. Cincinnati Police then returned to the scene, to determine what was occurring.
12. Several Officers interviewed Mr. Wilson and determined that they were unwilling to file charges against Mr. Wilson.
13. Officer Meucci and Officer Mullis placed Mr. Wilson under arrest.
14. Mr. Wilson had a legal right to carry a concealed weapon. Mr. Wilson had a right to defend himself and his family.
15. The Second Amendment to the United States Constitution protects Mr. Wilson's right to own and bear firearms.
16. Officer Meucci filed the Criminal Complaint against Mr. Wilson, charging him with improper discharge of a firearm.
17. Mr. Wilson was tried on this charge and acquitted by the Court on May 28, 2024.
18. The Cincinnati Police Department did not initially return Mr. Wilson's firearm to him.
19. It took Mr. Wilson almost a year to have his firearm returned.

**COUNT I**

**VIOLATION OF 41 U.S.C. §1983 and FIRST, SECOND, FOURTH,  
and FOURTEENTH TO THE UNITED STATES CONSTITUTION  
BY DEFENDANT'S MEUCCI AND MULLIS AND CITY OF CINCINNATI**

20. Mr. Wilson incorporates each of the foregoing allegations as if fully restated herein.

21. Officer Meucci's conduct and actions violated Mr. Wilson's clearly established constitutional rights under the First, Second, Fourth, and Fourteenth Amendments to the United States Constitution.

22. Officer Mullis's conduct and actions violated Mr. Wilson's clearly established constitutional rights under the First, Second, Fourth, and Fourteenth Amendments to the United States Constitution.

23. The City of Cincinnati failed to adequately train and monitor its police officers, and condoned, ratified, and acquiesced in these violations of Mr. Wilson's clearly established rights, as evidenced by his arrest and attempted prosecution.

24. Officer Meucci's and Officer Mullis's conduct and actions thus caused Mr. Wilson to suffer deprivation of his constitutional rights of liberty, speech, property, and right to bear arms, all to his damage in an amount to be determined at trial, but at least \$100,000.00.

## **COUNT II**

### **VIOLATION OF 41 U.S.C. §1983 and FIRST, SECOND, FOURTH, and**

### **FOURTEENTH AMENDMENTS TO THE U.S. CONSTITUTION**

### **BY DEFENDANTS MEUCCI AND MULLINS, AND CITY OF CINCINNATI**

25. Mr. Wilson incorporates each of the foregoing allegations as if fully restated herein.

26. Officer Meucci and Officer Mullis initiated and pararms and in the arrest, incarceration, and criminal prosecution of Mr. Wilson without probable cause,

because Mr. Wilson was exercising his right to bear arms, and defend himself in the face of a superior threat.

27. Officer Meucci's and Officer Mullis's conduct violated the clearly established constitutional rights of Mr. Wilson under the First, Second, Fourth, and Fourteenth Amendments to the United States Constitution.

28. The City of Cincinnati failed to adequately train and monitor its police officers and condoned, ratified, and acquiesced in these violations of Mr. Wilson's clearly established rights.

29. Officer Meucci, Officer Mullis, and the City of Cincinnati's actions caused Mr. Wilson suffered deprivation of his constitutional rights of liberty, property, and right to bear arms, all to his damages in an amount to be determined at trial, but at least \$100,000.00.

30. The nature and character of Officer Meucci's conduct, Officer Mullis's conduct, and the City of Cincinnati's conduct is such as to warrant punitive damages in an amount to be determined at trial, but not less than \$500,000.00.

### **Prayer for Relief**

**WHEREFORE**, the plaintiff Victor Wilson prays for judgment and relief against the defendants, jointly and severally, and an award of compensatory damages against them in an amount to be determined at trial, but in excess of \$100,000.00. In addition, the plaintiff Victor Wilson prays for judgment and relief against the defendants Trent Meucci, Cameron Mullis, and the City of Cincinnati in their individual capacities, jointly and severally, and an award of punitive damages against them in an amount to be determined at trial, but in excess of \$500,000.00.

And finally, the plaintiff Victor Wilson requests that he be awarded all allowable costs and expenses of prosecuting this action, including an award of attorney's fees, together with any and all other relief to which he may be entitled.

Plaintiff reserves the right to amend this Complaint should he find additional relevant information.

**Jury Demand**

The plaintiff Victor Wilson hereby demands a jury trial upon all issues in this case.

Respectfully submitted,

*/s/ Arica L. Underwood*

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Arica L. Underwood (#0067664)  
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*Attorney for Plaintiff Victor Wilson*

CASE NO.

23810153

**COMPLAINT**  
**HAMILTON COUNTY MUNICIPAL COURT** **ARRESTED**

CITY OF CINCINNATI vs. VICTOR DUANE WILSON THE DEFENDANT HEREIN  
(Name) **WAS PHYSICALLY ARRESTED**

6930 KLIENDALE AVE

(Address)

DATE

CINCINNATI OHIO 45231

PO T. MEUCCI P190

, being first duly cautioned and sworn,

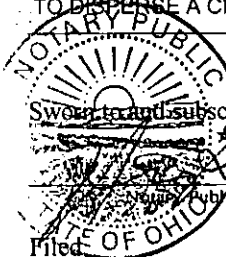
deposes and says that VICTOR DUANE WILSON on or about 06/18/2023

did DISCHARGE ANY FIREARM OR DANGEROUS WEAPONS, INCLUDING HANDGUNS, RIFLES,

AIR RIFLES OR AIR GUNS BY WHATEVER NAME KNOWN.

contrary to and in violation of Section 708-27 of the Cincinnati Municipal Code a misdemeanor of the  
\* M1 degree.

The complainant states that this complaint is based on DEFENDANT STATED HE FIRED SHOTS INTO THE AIR  
TO DISPERSE A CROWD OF 30 PEOPLE. OFFICERS RECOVERED FIREARM FROM THE DEFENDANT.



HANNAH R. P190  
Notary Public, State of Ohio  
My Commission Expires  
06/18/2026

Filed

PAVAN PARIKH  
(Clerk of Hamilton County Municipal Court)

By

Deputy Clerk

2300 FERGUSON RD

(Address)

CINCINNATI OHIO 45238



D138491507

PLAINTIFF'S  
EXHIBIT

**A**